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May 6, 1992

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Federal Communications Commission
Office of the Secretary

BY HAND DELIVERY

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: Petition for Rulemaking
Channel 236A
Winlock, Washington

Dear Ms. Searcy:

On behalf of Premier Broadcasters, Inc., submitted herewith are an original and four copies of a Petition for Rulemaking requesting the amendment of the FM Table of Allotments to include Channel 236A at Winlock, Washington.

If there are any questions regarding this Petition, please contact the undersigned.

Respectfully submitted,


Meredith S. Senter, Jr.

CCW/ccw

Enclosure

cc: Mr. Rodney J. Etherton
Mr. W. Jeffrey Reynolds

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BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

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In the Matter of)
)
Amendment of Section 73.202(b),)
Table of Allotments,)
FM Broadcast Stations)
(Winlock, Washington))

RM- Federal Communications Commission
Office of the Secretary

To: Chief, Allocations Branch
Mass Media Bureau

PETITION FOR RULEMAKING

Premier Broadcasters, Inc. ("Premier"), by its attorney and pursuant to Sections 1.401 and 1.420 of the Commission's rules, hereby petitions the Commission to amend Section 73.202(b), the FM Table of Allotments, to add Channel 236A (95.1 MHz) at Winlock, Washington.

Winlock is an incorporated city governed by a mayor and city council, and has a 1980 U.S. Census population of 1,052. The city has its own post office, library, and police and fire departments, as well as both an elementary school and a middle school. Winlock currently has no local AM, FM or television service. Allotment of Channel 236A would thus provide the community with its first local broadcast service.

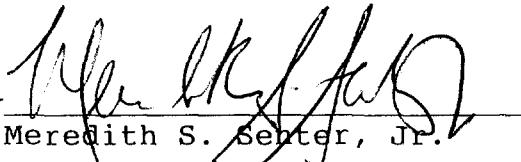
The Technical Statement attached hereto demonstrates that Channel 236A can be added at Winlock, Washington, in accordance with the Commission's minimum distance separation requirements as specified in Section 73.207 of the Commission's rules.

Premier hereby states its intention to apply for Channel 236A at Winlock, Washington, if its proposal is adopted.

In view of the above, Premier Broadcasters, Inc. respectfully requests the Commission to amend the FM Table of Allotments to add Channel 236A at Winlock, Washington.

Respectfully submitted,

PREMIER BROADCASTERS, INC.

By 
Meredith S. Senter, Jr.

Leventhal, Senter & Lerman
Suite 600
2000 K Street, NW
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May 6, 1992

Its Attorney

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du Treil, Lundin & Rackley, Inc.

A Subsidiary of A. D. Ring, P. C.

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Federal Communications Commission
Office of the Secretary

TECHNICAL STATEMENT
IN SUPPORT OF A
PETITION FOR RULE MAKING
TO AMEND THE FM TABLE OF ALLOTMENTS
PREMIER BROADCASTERS
WINLOCK, WASHINGTON

This technical statement and associated exhibit have been prepared on behalf of Premier Broadcasters to provide technical information in support of a Petition for Rule Making to amend 47 CFR 73.202(b) by the allotment of channel 236A (95.1 MHz) to Winlock, Washington.

Proposed Change in the Table of Allotments

It is requested that 47 CFR 73.202(b) be amended by the allotment of channel 236A to Winlock, Washington. Winlock, with a 1980 U.S. Census population of 1,052 persons, presently has no local AM, FM or TV service. Therefore, the proposal would bring a first local broadcast service to Winlock. The proposed changes are as follows:

| <u>City</u> | <u>Present</u> | <u>Proposed</u> |
|---------------------|----------------|-----------------|
| Winlock, Washington | -- | 236A |

The proposed channel 236A reference point is located approximately 198 kilometers (123 miles) from the nearest point of the U.S.-Canadian border. Therefore, the Commission is respectfully requested to notify this proposal to Canada as an International Class B1 assignment.

Compliance With FCC Rules

The attached Figure 1 is a tabulation of required separations pertinent to use of channel 236A at Winlock. The Winlock reference coordinates contained in the Index to the USGS National Atlas (Latitude 46° 29' 30" North, Longitude 122° 56' 12" West) have been used for distance calculations. As shown, the reference coordinates comply with the Commission's minimum distance separation requirements contained in 47 CFR 73.207 with respect to all existing, authorized and proposed stations and allotments.

Based on maximum Class A facilities of an effective radiated power of 6 kW and an antenna height above average terrain of 100 meters, the distance to the 70 dBu (3.16 mV/m) city grade contour is approximately 16 kilometers (10 miles). The Winlock reference site is located within the Winlock city limits as defined by the 1980 U.S. Census and the most distant point of the city from this site is located at a distance of approximately 1.5 kilometers (0.9 mile). Therefore, the proposal would appear to comply with the Commission's city coverage requirements contained in 47 CFR 73.315 as the 70 dBu contour, based on maximum Class A operation from the reference site, would extend approximately 12.5 kilometers (9.1 miles) beyond the Winlock reference point.

Conclusion

Channel 236A can be allotted to Winlock, Washington in apparent compliance with all applicable Commission Rules with no site restriction. The proposal will result in a first local broadcast service to Winlock (population 1,052 persons). Therefore, it is requested that channel 236A be allotted to Winlock, Washington.



W. Jeffrey Reynolds

du Treil, Lundin & Rackley, Inc.
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(202) 223-6700

May 1, 1992

Figure 1

FM SEPARATION STUDY

Job Title :Channel 236A, Winlock, Washington Separation Buffer 32 km
 FCC DB Date : 03/24/92
 Channel 236A (95.1 MHz) Coordinates : 46-29-30 122-56-12/1

| Call Status | City State | FCC File No. | Channel Freq. | ERP(kW) HAAT(m) | Latitude Longitude | Bearing deg-Tru | Dist. (km) | Req. (km) |
|---|---------------|--------------|------------------|--------------------|-----------------------|--------------------|---------------|--------------|
| KUKN | Kelso | | 233A | 6.00 | 46-12-54 | 194.5 | 31.78 | 31 |
| CPM | WA | BMPH910515IG | 94.5 | 100.0 | 123-02-24 | SS | 0.78 | CLOSE |
| Proposed to Canada as B1 910912-Accepted by Canada 911107 | | | | | | | | |

ERP exceeds maximum allowed under International Agreement

| | | | | | | | | |
|---------------------------------|--------------|-------------|-------|-------|-----------|-------|--------|-------|
| KQEM | Seaside | | 234A | 3.00 | 45-58-55 | 233.4 | 94.51 | 31 |
| CP | OR | BPH880310MN | 94.7 | 65.0 | 123-55-02 | | 63.51 | CLEAR |
| KUOW | Seattle | | 235C1 | 100. | 47-36-58 | 20.6 | 133.84 | 133 |
| LIC | WA | BLH850715KJ | 94.9 | 224.0 | 122-18-28 | | .84 | CLOSE |
| KNJM | Lincoln City | | 236C2 | 24.5 | 44-53-24 | 204.9 | 195.73 | 166 |
| CP | OR | BPH901220MJ | 95.1 | 216.0 | 123-58-51 | | 29.73 | CLEAR |
| KGHOFM | Hoquiam | | 237A | 1.15 | 46-55-53 | 309.1 | 78.15 | 72 |
| LIC | WA | BLH7123 | 95.3 | 137.0 | 123-44-02 | | 6.15 | CLOSE |
| Class B1 with respect to Canada | | | | | | | | |
| KXLFM | Portland | | 238C | 100. | 45-29-23 | 170.5 | 112.92 | 95 |
| LIC | OR | BLH4129 | 95.5 | 302.0 | 122-41-47 | | 17.92 | CLEAR |
| KLTX | Seattle | | 239C | 100. | 47-32-41 | 27.9 | 132.97 | 95 |
| LIC | WA | BLH810330AK | 95.7 | 360.0 | 122-06-28 | | 37.97 | CLEAR |
| NEW | South Bend | | 289C3 | 3.5 | 46-41-43 | 289.9 | 67.82 | 12 |
| APP | WA | BPH910826MN | 105.7 | 271.0 | 123-46-15 | | 55.82 | CLEAR |

** End of separation study for channel 236A **

/1 Reference coordinates for Winlock listed in the Index to the
 USGS National Atlas.